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TM:MPR
F.#2014R01935

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

INDICTMENT

- against -

BRIAN ADAMS,
also known as "Bryan Adams,"

Defendant.

Cr. No. _____
(T. 18, U.S.C., §§ 1591(b)(1), 1594(a),
1594(c), 1594(d), 2 and 3551 et seq.; T.
21, U.S.C., § 853(p))

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THE GRAND JURY CHARGES:

COUNT ONE
(Sex Trafficking Conspiracy)

1. In or about and between January 12, 2014 and January 20, 2014, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant BRIAN ADAMS, also known as "Bryan Adams," together with others, did knowingly and intentionally conspire to recruit, entice, harbor, transport, provide, obtain and maintain by any means one or more persons, in and affecting interstate commerce, and to benefit, financially and by receiving things of value, from participation in a venture that engaged in such acts, knowing, and in reckless disregard of the fact, that such persons had not

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attained the age of 18 years and would be caused to engage in one or more commercial sex acts, contrary to Title 18, United States Code, Sections 1591(a)(1) and 1591(a)(2).

(Title 18, United States Code, Sections 1594(c) and 3551 et seq.)

COUNT TWO

(Attempted Sex Trafficking – Jane Doe #1)

2. In or about and between January 12, 2014 and January 20, 2014, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant BRIAN ADAMS, also known as “Bryan Adams,” together with others, did knowingly and intentionally attempt to recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, to wit: Jane Doe #1, an individual whose identity is known to the Grand Jury, in and affecting interstate and foreign commerce, and to benefit, financially and by receiving things of value, from participation in a venture that engaged in such acts, knowing, and in reckless disregard of the fact, that Jane Doe #1 had not attained the age of 18 years old and would be caused to engage in one or more commercial sex acts, contrary to Title 18, United States Code, Sections 1591(a)(1) and 1591(a)(2).

(Title 18, United States Code, Sections 1594(a), 1591(b)(1), 2 and 3551 et seq.)

COUNT THREE

(Attempted Sex Trafficking – Jane Doe #2)

3. In or about and between January 12, 2014 and January 20, 2014, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant BRIAN ADAMS, also known as “Bryan Adams,” together with others, did knowingly and intentionally attempt to recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, to wit: Jane Doe #2, an individual whose identity is known to the Grand Jury, in and affecting interstate and foreign commerce, and to benefit, financially

and by receiving things of value, from participation in a venture that engaged in such acts, knowing, and in reckless disregard of the fact, that Jane Doe #2 had not attained the age of 18 years old and would be caused to engage in one or more commercial sex acts, contrary to Title 18, United States Code, Sections 1591(a)(1) and 1591(a)(2).

(Title 18, United States Code, Sections 1594(a), 1591(b)(1), 2 and 3551 et seq.)

**CRIMINAL FORFEITURE ALLEGATIONS
AS TO COUNTS ONE THROUGH THREE**

4. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged in Counts One through Three, the government will seek forfeiture in accordance with Title 18, United States Code, Section 1594(d), of any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such offenses, and any property, real or personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of such violations.

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

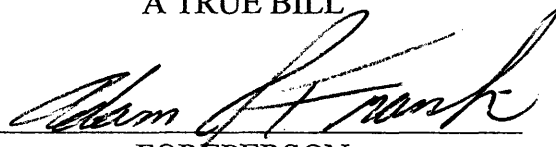
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to

seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 1594(d); Title 21, United States Code, Section 853(p))

A TRUE BILL


FOREPERSON

LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK



UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

F. #2014R01935
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

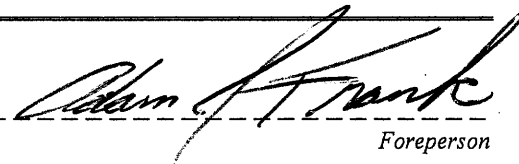
BRIAN ADAMS,
also known as "Bryan Adams,"

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 1591(b)(1), 1591(b)(2), 1594(a), 1594(c), 1594(d), 2
and 3551 et seq.; T. 21, U.S.C., § 853(p))

A true bill.


Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Michael P. Robotti, Assistant U.S. Attorney (718) 254-7576